

AFFIDAVIT OF PROBABLE CAUSE IN SUPPORT OF A SEARCH WARRANT

UNITED STATES POSTAL INSPECTION SERVICE

I, MARC A. KUDLEY, DO HEREBY DEPOSE AND SAY:

1. I am a United States Postal Inspector and have been so employed since May 2012, presently assigned at the U.S. Postal Inspection Service (USPIS) Cleveland, Ohio Field Office to the Contraband Interdictions and Investigations Group, which strives to protect the U.S. Mail from dangerous drugs and illegal contraband, specifically illicit drugs and firearms. I have received training in the detection and investigation of drug trafficking. I have worked drug trafficking investigations involving the U.S. Mails since August 2012, during which time I have been involved in narcotics investigations leading to prosecution in U.S. District Court, as well as state courts.
2. I know based on training and experience that U.S. Mail is often used by narcotic traffickers to transport controlled substances. I know from my training and experience that the U.S. Postal Service (USPS) Priority Mail system is commonly used to transport controlled substances because Priority Mail provides traceability, reliability, and timely delivery. The guaranteed delivery timeframe of approximately two to three days for Priority Mail places time pressures on law enforcement agents to identify, search, and deliver these drug parcels in a timely manner.
3. On October 18, 2021, while reviewing USPS business records, I identified USPS Priority Mail parcel bearing tracking number 9505 5141 4370 1288 4850 68, addressed to Bradley Hail, 1425 Norwood Place NW, Canton, OH 44709, with a return address of Andrew Villaneuva, 3701 S Sycamore St, Santa Ana, CA 92707 (hereinafter "the Subject Parcel").
4. The Subject Parcel is described as a large brown cardboard box with Priority Mail tape, weighing approximately seven pounds and four ounces. I identified the Subject Parcel as a suspect drug parcel based on several characteristics, including but not limited to type of mail, origin, destination, and size.
5. The Subject Parcel was mailed on October 15, 2021 from the Santa Ana, California 92711 Post Office and bore \$65.90 in U.S. Postage. I know based on training and experience that California has historically been a source area for mailed controlled substances into Northern Ohio.
6. I made inquiries with CLEAR, an electronic database that has proven reliable in previous investigations in determining the legitimacy of name, address, and phone number information, concerning the delivery address of 1425 Norwood Place NW, Canton, OH 44709, and was unable to associate an individual with the name Bradley Hail at the listed delivery address.

7. I also made inquiries with CLEAR concerning the return address of 3701 S Sycamore St, Santa Ana, CA 92707, and was unable to associate an individual with the name Andrew Villanueva at the listed return address.
8. I know based on training and experience, that individuals using the U. S. Mail for the purpose of transporting controlled substances will often place fictitious address, name and/or phone number information, different variations of their names, or no names at all on these parcels, to conceal their true identities from law enforcement should the parcel be seized.
9. On October 18, 2021, I contacted the Canton, Ohio Main Post Office and requested the Subject Parcel be held pending further investigation. Detective Jordan Shank of the Canton, Ohio Police Department and FBI Safe Streets Task Force in Canton, Ohio, took custody of the Subject Parcel at the Canton, Ohio Main Post Office and transported it to the FBI Safe Streets Task Force in Canton, Ohio.
10. On October 18, 2021, at the FBI Safe Streets Task Force in Canton, Ohio, the Subject Parcel was placed into a lineup containing several blank parcels which emanated no narcotics odors. Narcotic detection canine "Kilo", handled by Detective Jordan Shank of the Canton Police Department and Safe Streets Task Force was allowed to examine the lineup. According to Detective Shank, Kilo gave a positive alert on the Subject Parcel and none of the blank parcels. According to Detective Shank, this positive alert meant Kilo detected the odor of an illegal drug emanating from the Subject Parcel.
11. Detective Shank has been State Certified as a Narcotics Canine handler and he and narcotics canine Kilo have worked together since February 2020. Detective Shank and canine Kilo were both certified in January 2021 by the Ohio Peace Officers Training Academy (OPOTA) as a specialty purpose K-9 team, narcotic detection. During this time, Kilo was trained and certified to alert to the presence of the odors from marijuana, cocaine, heroin, methamphetamine and their derivatives. Detective Shank has been trained how to handle a detector K-9 and read their alerts. According to Detective Shank, Kilo is a reliable K-9 assist unit.
12. I know based on training and experience that individuals who regularly handle controlled substances often leave the scent of controlled substances, which narcotic canines are trained to indicate alert, on the box, contents of the box, and/or other packaging material they handle.

13. Based on the information contained herein, your Affiant maintains there is probable cause to believe that USPS Priority Mail parcel bearing tracking number 9505 5141 4370 1288 4850 68, addressed to Bradley Hail, 1425 Norwood Place NW, Canton, OH 44709, with a return address of Andrew Villaneuva, 3701 S Sycamore St, Santa Ana, CA 92707, contains controlled substances, and/or proceeds which are evidence thereof, and/or contraband, in violation of Title 21, United States Code, Section 841(a)(1).



MARC A. KUDLEY
POSTAL INSPECTOR

This affidavit was sworn to by the affiant, who attested to its contents by telephone, pursuant to Crim. R. 4.1 (b)(2)(A), after a PDF was transmitted by email, per Crim R. 4.1(d)(3), THIS 18th DAY of October 2021.



AMANDA M. KNAPP
U. S. MAGISTRATE JUDGE